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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8488

UNITED STATES OF AMERICA, Plaintiff,	Magistrate Case No.:
v.	COMPLAINT FOR VIOLATION OF
Jesus Antonio MORA-Quinonez (1)	21 U.S.C. § 952 & 960
Lorena Hayde PRINCE de Mora (2)	Importation of a Controlled Substance (Felony)
Defendant.	

The undersigned complainant being duly sworn states:

That on or about May 31, 2008, within the Southern District of California, defendant Jesus Antonio MORA-Quinonez and Lorena Hayde PRINCE de Mora did knowingly and intentionally import approximately 26.16 kilograms (57.55 pounds) of cocaine a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 952 & 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Special Agent Christopher Miller
U.S. Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 2ND, DAY OF JUNE 2008.

PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

UNITED STATES OF AMERICA

v.

Jesus Antonio MORA-Quinonez

Lorena Hayde PRINCE de Mora

STATEMENT OF FACTS

This statement of facts is based on the reports, documents, and notes furnished to US Immigration and Customs Enforcement Special Agent Christopher Miller.

On May 31, 2008 at approximately 1115 hours, Jesus Antonio MORA-Quinonez and Lorena Hayde PRINCE de Mora entered the United States at the Calexico, California, West Port of Entry. MORA was the driver, PRINCE, and two juvenile females were the passengers of a 2003 Chevrolet Suburban, bearing Baja California, Mexico license plate AHT1444. The two juvenile females were subsequently released by agents. During a pre-primary roving operation, Canine Enforcement Officer (CEO) Parrish and his Human Narcotic Detector Dog (HNDD) "Josey" (CG-65) were utilized on MORA's vehicle. HNDD "Josey" alerted and responded to the spare tire of MORA's vehicle. CBPO Lopez was notified of the alert and received a negative oral Customs declaration from MORA. The vehicle was referred to the secondary lot for closer examination.

In the vehicle secondary lot, CBPO Mendibles utilized a density meter on the spare tire mounted underneath MORA's vehicle. The spare tire had abnormally high readings. CBPO Ortiz noticed that the spare tire contained five lugs on the wheel and the wheels mounted on the vehicle contained six lugs. CBPO Ortiz opened the spare tire revealing packages.

A subsequent inspection of the spare tire revealed 25 packages. One of the packages was probed and a sample of a white powdery substance was obtained, which field tested positive for cocaine. The 23 packages had a combined net weight of approximately 26.16 kilograms (57.55 pounds).

PRINCE was placed under arrest and advised of her Constitutional Rights, which she acknowledged and waived, agreeing to answer questions. PRINCE stated her husband MORA was the registered owner of the vehicle, but she was the primary user of the vehicle. PRINCE explained that to her knowledge the vehicle had been in her or MORA's control.

MORA was placed under arrest and advised of his Constitutional Rights, which he acknowledged and waived, agreeing to answer questions. MORA stated that he was the registered owner of the vehicle. MORA stated that on May 30, 2008, he and PRINCE went to Jesus Geraz' place and a spare tire was mounted on his vehicle. MORA gave conflicting statements and stated that he drove the suburban to Mr. Geraz' place alone.

PRINCE denied going anywhere with MORA except to eat hamburgers. PRINCE denied knowledge of any changing of the spare tires and further stated that MORA did not drive her suburban the night before their arrest.

MORA and PRINCE were placed under arrest and were booked into the Imperial County Jail pending their initial appearance before a U.S. Magistrate Judge.